



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

NJM/SKW  
F. #2015R01171

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 28, 2023

By ECF and Email

The Honorable Brian M. Cogan  
United States District Court  
Eastern District of New York  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Kaveh Lotfolah Afrasiabi  
Criminal Docket No. 21-46 (BMC)

Dear Judge Cogan:

The government respectfully writes regarding the trial date and pre-trial briefing and disclosure schedule in the above-captioned matter.

On March 7, 2023, the Court entered an order scheduling the trial in this case to begin on October 24, 2023, "except that if stand-by counsel's trial in Arizona is not adjourned before 10/10/23, then trial of this case shall proceed on 1/8/24."

Based on conversations with counsel and the defendant, the government understands that counsel's trial calendar has not cleared (and is unlikely to clear), and that the defendant separately wishes for trial to be adjourned. Accordingly, the government does not oppose an adjournment of the trial to January 2024. The government is prepared to proceed at the Court's convenience and prefers to proceed as early as possible, although counsel has requested an adjournment until March, and the defendant has requested an adjournment until February or March.

The government further requests that the Court set dates for pretrial motions and disclosures, in accordance with the below schedule.

